

Purpose:

Greene Tweed, a family-owned business in its fourth generation of ownership, is a market leader in the design and manufacture of high-performance materials and custom-engineered solutions for the aerospace and defense, chemical processing, industrial operations, life sciences, energy, and semiconductor industries. Greene Tweed is headquartered outside of Philadelphia, Pennsylvania, United States of America and maintains a global presence, with manufacturing, sales, engineering centers, and channel partners in over 19 countries across the Americas, Europe, and Asia.

Our worldwide network of commercial, design, engineering, and manufacturing resources allow us to deliver the local support consistent with a family-owned business on a global scale. To this end, Greene Tweed's commitment to integrity and ethical practices are at the heart of our company. As Greene Tweed employees working across many countries, speaking several languages, our actions as both individuals and a collective reflect on the company's goodwill, reputation, and trust. Accordingly, it is paramount that each employee plays an active role in upholding the values and principles outlined in this Global Code of Conduct (the "Code").

This document is more than simply a Code of Conduct. It is a living document that reflects Greene Tweed's principles and ensures we continuously make decisions that align with our highest values.

Scope/Eligibility:

This Code is applicable to all employees (whether permanent, temporary or on contract, direct or through contractor, retainer or full-time consultant), and members of the Board of Directors of the Company ("Personnel"). Unless the context requires otherwise, the term "Company" or "Greene Tweed" in this Code includes GT Global Holdings, Inc., and its subsidiaries, affiliates and business units within and outside the United States. Greene Tweed also expects its business partners, including suppliers, service providers, agents, and channel partners (dealers, distributors and others) to adhere to the principles of the Code.

This Code serves as a guide for our daily business interactions, reflecting our standard for appropriate behavior and our corporate values. The Code clearly conveys to each of us that the manner in which we achieve our business results matters just as much as achieving them. Most importantly, all Personnel are responsible for demonstrating integrity and leadership by complying with the provisions of this Code, Company policies, and all applicable laws. By fully including ethics and integrity in our ongoing business relationships and decision-making, we demonstrate a commitment to a culture that promotes the highest ethical standards.

Greene Tweed's Code of Conduct is intended to prevent, identify, and/or address any allegation of misconduct; to provide guidance to Personnel in recognizing and handling important ethical and legal issues; and to foster a culture of honesty and accountability within the organization. All Personnel must conduct themselves according to this Code and seek to avoid improper behavior.

This Code is not intended to cover every legal or ethical issue that may arise in the course of the business. If you have any questions or concerns regarding this Code or its application in any circumstance, you should contact the Vice President, Human Resources or General Counsel.

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In instances where this Code is more restrictive than applicable law, all Personnel are required to abide by this Code. If Personnel are uncertain of the applicable legal requirements or if they believe that they are subject to conflicting legal obligations, they must bring the matter to the attention of the General Counsel immediately.

Duty to Report:

Greene Tweed is committed to maintaining trusting and constructive relationships between employees and their representatives. This is particularly important as Personnel are vital to Greene Tweed’s responsible performance. Greene Tweed encourages dialogue between employees, their representatives, and management to assist employees in identifying actual or potential situations that might lead to a violation of the Code and finding solutions to prevent such situations.

Personnel should report breaches or potential breaches of this Code to their individual manager or supervisor. Part of the manager/supervisor’s job is to listen to employees, understand their questions and concerns, and act on them appropriately. In cases of serious breach, Personnel may speak directly to the General Counsel or Vice President, Human Resources.

No matter how instances are reported, Personnel can be assured that confidentiality will be maintained to the highest degree possible. Limited disclosures will be made only to facilitate investigation or where required by law. All reports will be investigated, and all investigations will be conducted independently, in a manner that reflects Greene Tweed’s values and will respect the rights of all parties involved and applicable laws.

No Retaliation:

Greene Tweed encourages every employee to speak up for what is right when they see something is wrong. In no event shall an employee who makes a report be subject to retaliation. No action will be taken against an employee who expresses a concern that is found to be inaccurate if the concern is expressed in good faith. On the other hand, false or abusive accusations will not be tolerated and may result in disciplinary action.

Corporate Responsibility in the Workplace:

Health and Safety

High safety standards and continuous improvement thereof are fundamental to Greene Tweed’s work ethic. Greene Tweed’s goal is zero accidents, zero injuries. We are committed to broad involvement in our health and safety programs and the Company provides safe and healthy working environments for Personnel. Each employee is expected to contribute to the safety of the workplace by being alert and aware of the rules, policies, and procedures, and by reporting any unsafe condition.

To the extent that site security affects safety, each Greene Tweed location must assess its situation and take appropriate actions.

Violence and threatening behavior are not permitted. Employees should report to work in a condition to perform their duties, free from the influence of prohibited drugs or alcohol. The use of prohibited drugs or alcohol or other similar substances or improper use of medication in the

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workplace and during working hours or while conducting Company business is absolutely prohibited.

Equal Opportunity, Diversity, and Inclusion

Our goal is to seek the most qualified people to work at Greene Tweed and to fully utilize their abilities, train, promote, assign, and compensate, without regard to their race, color, national origin, age, disability, sex, sexual orientation, gender identity, transgender status, language, income, religion, political opinion, family status, ancestry, military status, or any other basis. In jurisdictions where this is contrary to local practice, Greene Tweed will be amongst the leaders in the business community to move policy in the direction of equal opportunity.

Greene Tweed is committed to creating a workplace climate that promotes workplace safety, mutual respect, acceptance, teamwork, and productivity with people from diverse backgrounds. In this environment, the values of fairness, integrity, and respect for the individual are paramount. It is imperative that Greene Tweed successfully attract and retain the best candidates in an increasingly diverse talent pool. Greene Tweed's commitment to workplace diversity is a critical building block for our continued competitive leadership in the Global Marketplace.

Discrimination, which is the unfair treatment of employees based on prejudices, will not be tolerated by Greene Tweed. Any Personnel engaging in discrimination will be subject to disciplinary action up to and including termination of employment, and/or be liable to indemnify the Company for the loss incurred by the Company.

Harassment-Free Environment

We strive to maintain a safe, stimulating, and harassment-free workplace. Harassment is any conduct with the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, humiliating, or offensive work environment. Harassment in the workplace, whether moral, sexual, physical, verbal, or non-verbal, is strictly prohibited.

Moral harassment can be defined as any repeated abusive conduct, in particular behavior, words, actions, gestures, texts, or images, capable of violating the personality, dignity, or physical or psychological integrity of a person, jeopardizing their employment, or deteriorating the working environment. Sexual harassment can be defined as any unwelcome sexual advance, unwelcome request for sexual favors or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances. A hostile work environment is one where the words and actions of a supervisor, manager or coworker negatively or severely impacts another employee's ability to complete their work. Any employee can be responsible for creating a hostile work environment.

Any Personnel engaging in harassment of any kind will be subject to disciplinary action up to and including termination and/or be liable to indemnify the Company for the loss incurred by the Company. All Personnel are encouraged to share relevant information about actions that may either violate or have the potential to violate this Code with the concerned supervisor or report to the same pursuant to this Code and/or the Non-discrimination and Harassment and/or Workplace Dating Policies. Superiors need to be alert to any potential cases of intimidation or harassment, and ensure that this situation is stopped as soon as possible.

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Respectful Workplace

Greene Tweed strives to create a respectful workplace. Fostering a respectful workplace means living each day displaying respect to others. These standards include, but are not limited to:

- Displaying honest, sound ethics and integrity in all business contacts and decisions consistent with our values and this Code.
- Respecting co-worker’s ideas, suggestions, beliefs, and opinions; accepting and valuing differences; and providing constructive input.
- Demonstrating professional conduct, including courtesy in how we speak to one another, and good manners in words and actions.
- Working collaboratively and supporting your colleagues while resolving differences of opinion and/or other conflicts in a productive manner.
- Showing respect for customers and providing excellent customer service.
- Being aware of the potential impact of your actions on others and avoiding purposefully offensive behavior.
- Refraining from derogatory or demeaning references regarding another person, even if there was no intention to harass or demean.
- Avoiding unwanted physical contact, belittling, insults, ostracism, insensitive humor, disparaging language, and physical intimidation.
- Not engaging in bullying or abusive conduct.
- Cooperating and displaying honesty during the course of any investigation being conducted by the Company.

Certain actions taken by managers or Personnel are necessary to carry out business needs and are not inherently a violation of this Section of the Code, including but not limited to:

- Coaching, disciplinary discussions, performance evaluations, constructive feedback, coaching regarding employee conduct or work performance. Managers/supervisors must be free to provide constructive criticism to employees on how they carry out their work, including employee behaviors and other requirements of the job.
- High workplace expectations.
- Addressing disrespectful behavior that is reported or observed.
- Encouraging the reporting of instances of disrespect or behavior that runs afoul of this policy.
- Differences of opinion and non-aggressive conflicts that arise in working relationships.

All Personnel are encouraged to share relevant information about actions that may either violate or have the potential to violate this Code with the concerned supervisor or report to the same pursuant to this Code. Violation of this Code may result in disciplinary action up to and including termination.

Conflicts of Interest

Personnel shall exercise fair, objective, and impartial judgment in all business dealings, placing the interests of Greene Tweed over any personal interests in matters relating to the business of the Company. A conflict of interest arises when our own personal interests influence our duty to act in

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the best interests of Greene Tweed. All Personnel must avoid any situation that creates a potential or actual conflict of interest. Moreover, all Personnel are obligated to disclose any potential or actual conflict of interest immediately to their manager or Human Resources and withdraw from any decision-making process that creates or could be perceived as creating a conflict of interest.

Exceptions to Greene Tweed’s Conflict of Interest Policy may be made with the approval of the Executive Leadership Team on a case-by-case basis.

Outside Positions

While Greene Tweed respects the personal and private lives of all Personnel, Personnel should never engage in activities that compete against Greene Tweed, even in personal time outside of work. All Personnel should exercise caution if asked to serve as a director, trustee, or officer for another company or organization, and prior approval must be obtained from the employee’s appropriate Executive Leadership Team member. No prior approval is required for positions in not-for-profit organizations, charitable, or sports organizations. Under no circumstances shall work conducted for outside positions be done on Company time or interfere with Personnel’s role within Greene Tweed.

Outside Relationships

Doing business on behalf of Greene Tweed with family members, whether the family member is an actual or potential customer, competitor, or vendor, can create a conflict of interest that must be disclosed immediately. We must also ensure that any friendships outside of the Company do not impact our ability to act in the best interest of Greene Tweed on all business-related matters.

Relatives Working in the Same Location

Greene Tweed may permit individuals who are relatives to work in the same department, division or subsidiary, provided that no direct reporting or supervisory/management relationship exists. “Relative” means immediate family member (i.e., mother, father, sibling, child) or a spouse of an immediate family member. No Personnel are permitted to work under a relative where one relative’s work responsibilities, salary, or career progress could be influenced by the other relative.

No applicant will be hired, and no employee will be transferred, into a position where he or she will be supervised directly or indirectly by a relative.

No relatives are permitted to work in the same department, site or subsidiary or in any other position in which the company believes an inherent conflict of interest may exist.

Conflicts Arising After Employment

If a conflict or apparent conflict arises as a result of an employee being a relative or becoming a relative of another employee, then one of the employees may be offered a different position that does not cause a conflict at the earliest practicable time. If a position has been made available, and the employee refuses the position, it will be considered a voluntary resignation.

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Relatives of Executives

Relatives of Greene Tweed Executives and/or Functional, General or Regional Managers or Site Leaders will not be considered for employment within the same division or subsidiary as the Executive or Functional, General or Regional Manager or Site Leaders. Executives are defined as members of the Executive Leadership Team and direct reports to the President and Chief Executive Officer.

Relatives of Human Resource and Finance Professionals

Relatives of HR and Finance professionals should not be considered for employment. If a conflict or apparent conflict arises as a result of an employee being a relative or becoming a relative of another employee in HR or Finance, then one of the employees will be required to leave within a six-month period.

Temporary Positions

Relatives of all employees may be employed in temporary or summer positions at the discretion of local management. Temporary assignments should not last more than 6 months (or longer where local laws dictate).

Data Privacy

Greene Tweed respects the privacy of its customers, suppliers, Personnel, and all other individuals with whom we have business interactions. We comply with all applicable national laws that protect privacy of personal information, including the European Union General Data Protection Regulation, and all laws and regulations in the jurisdictions in which Greene Tweed conducts its business.

See Greene Tweed's Acceptable Use Policy.

Confidentiality

Confidential and proprietary information generated and gathered in our business is a valuable Company asset. Protecting this information is vital to our continued growth and ability to compete. All confidential and proprietary information should be maintained in strict confidence, except when disclosure is authorized by the Company. All Personnel are required to use the Confidential Information of Greene Tweed for business purposes only and must always keep such information in strict confidence. Moreover, all Personnel must take appropriate actions to guard Greene Tweed's Confidential Information from disclosure to competitors and other unauthorized third parties, including previously employed individuals. Confidential Information is not simply technical data; rather it includes details surrounding business information, financial data, customer lists, supplier lists, Company internal protocols, HR investigations, customer information or feedback, quality investigations, production details, etc.

This responsibility extends to Confidential Information of third parties that the Company has received under nondisclosure agreements. We must not disclose any confidential information unless disclosure is authorized or legally mandated.

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Use of Company Assets

All Personnel should endeavor to protect the Company’s assets (both physical and intangible) and ensure their efficient use. Theft, carelessness, loss, and waste have a direct impact on the Company's financial performance. Personnel of the Company must use the Company's assets and services solely for legitimate business purposes of the Company and not for any personal benefit or the personal benefit of anyone else.

Use of Electronic Media and Social Media

Greene Tweed provides access to and use of electronic mail, voicemail, the intranet, the Internet, and other electronic media for business purposes. This is provided to make it easier for Personnel to communicate with each other and with appropriate third parties – including contractors, suppliers, customers, shareholders, government agencies, and academic institutions.

Greene Tweed’s electronic media is not to be used for any purposes that violate applicable laws, rules and regulations and Company standards, policies, or procedures. This includes transmission of threatening, obscene or harassing materials. Incidental personal use of electronic media that does not interfere with Greene Tweed’s business or an employee's performance of his or her abilities is acceptable, as long as such personal use does not include illegal, unethical, or otherwise offensive subject matter.

Greene Tweed may monitor or access employee use of its electronic media at any time in accordance with applicable laws. Personnel should not participate in the inappropriate use of social media and should not tolerate disrespectful or unprofessional usage of social media, such as posting content that is abusive, malicious, obscene, threatening, or intimidating, or content that contains ethnic, religious, gender, or other derogatory statements in any message or post that relates to Greene Tweed, its business, its clients, its business partners, or Personnel.

All Personnel must use social media in accordance with Greene Tweed’s Acceptable Use Policy. Only an approved spokesperson(s) can communicate on behalf of Greene Tweed; providing professional references or recommendations in social media is strictly prohibited. If an employee is of the opinion that an official Greene Tweed response may be required for something on social media, such employee should contact the Director of Marketing. Employees should never disclose any information that is not already in public domain by lawful means. All nonpublic information must be treated as Confidential Information.

Corporate Responsibility in Conducting Business:

Anti-Bribery and Anti-Corruption

Greene Tweed is committed to doing business with integrity. At Greene Tweed, we compete in our markets based on the differentiation, quality, and value of our products and services, and we do not use corruption to gain an unfair competitive advantage.

Greene Tweed strictly prohibits corruption in any form, including bribery. Bribery is the offering, giving, soliciting, or receiving of an item of value (or any other advantage) in order to improperly

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influence the judgment or conduct of a person in a position of authority. No Personnel shall give or receive bribes in order to obtain or retain business. Greene Tweed does and all Personnel shall abide by all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), 2010 Bribery Act, and the local laws in every country in which we undertake business. These laws prohibit bribery of government officials and mandate that companies establish and maintain accurate books and records and sufficient internal controls.

Gifts and Entertainment

The giving of business gifts is a customary way to strengthen business relationships and, with some restrictions, is a lawful business practice. Personnel may give and receive appropriate, lawful business gifts in connection with their Greene Tweed work with commercial customers, suppliers, joint venture partners, and other nongovernmental parties, provided that all such gifts are nominal in value, cost and frequency, and not given or received with the intent or prospect of influencing the recipient’s business decision-making. Gifts of Greene Tweed products, or promotionally-labeled items, are generally acceptable. All giving of business gifts must be properly recorded and accounted for according to Greene Tweed’s Travel and Entertainment Policy.

No Personnel may give or receive a gift that violates the law, regulations, agreements, reasonable customs of the marketplace, or if it is known that the receipt of a gift would violate the recipient’s company policy. Personnel shall never accept or offer gifts of cash or cash equivalents, such as gift certificates. Moreover, Personnel shall never accept a gift that could be viewed as lavish.

Special laws and rules apply to gifts to government employees or employees of government-owned or controlled entities, and it is Greene Tweed policy to strictly comply with all such restrictions. Local laws in the United States and around the world strictly limit gifts to government employees. These may be criminal acts, regardless of whether they are paid for with Greene Tweed or personal funds.

Greene Tweed does not allow for corrupt practices in any form. Even when legal, employees cannot give or receive business gifts if doing so would violate this Code or Company Policy.

Laws and customs of some countries permit gifts and courtesies. Refusing such gifts or courtesies might be considered offensive in that country. In a situation where it is difficult or inadvisable to refuse a gift or courtesy, you must disclose receipt of the gift to your manager immediately. The manager will assist in handling the matter in consultation with the Vice President, Human Resources.

Personnel must follow this Code even when no reimbursement from the Company is sought.

Fair Competition

Greene Tweed values fair and open competition and wants to succeed ethically and with the highest degree of integrity. Greene Tweed will not conduct business in a manner that distorts, eliminates, or discourages competition, or that provides improper competitive advantages. As the Company’s business interests are spread across the world, Greene Tweed may be subject to competition laws of various jurisdictions, and all Personnel shall comply with these laws. Most

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countries have well-developed bodies of law designed to encourage and protect free and fair competition. Greene Tweed is committed to adhering to these laws both in letter and spirit.

Moreover, Greene Tweed is committed to creating employment opportunities in local communities. We are aware that our business affects our local and wider community whether as employees, customers, or suppliers so we are constantly striving to build partnerships to create positive change.

Fraudulent Activity

The Company is committed to precluding and/or swiftly addressing fraudulent activity. Fraudulent activity is defined as deceit, trickery, sharp practice, or breach of confidence, intentionally perpetrated for profit or to gain some unfair or dishonest advantage. This includes but is not limited to falsification of information, intentional omission, false pretenses, and deliberate misuse of qualified resources or certification/qualification/authorization. Fraudulent activity can occur at any level of an organization and be management-directed or initiated by an individual.

Some examples of fraudulent activity:

- Intentional misrepresentation/falsification of production/test/inspection results and records.
- Intentional omission of a processing step.
- Use of inspection stamps by unauthorized personnel.

All potential instances of fraudulent activity should be immediately reported to your supervisor or manager, or a representative of the Human Resources or Legal Departments for investigation. If fraudulent activity is confirmed, disciplinary action may be taken, up to and including termination, in addition to notification of customers and other interested parties, depending on the nature and impact of the activity.

Supply Chain

Greene Tweed respects its business partners and honors its binding commitments. Greene Tweed expects its vendors, suppliers, and customers to comply with all laws and regulations governing their activities, both within their own worksites and beyond. Greene Tweed encourages all business partners to adhere to the spirit of this Code in their operations.

Greene Tweed applies a worldwide structure, fair and ethical process to select and evaluate its suppliers in order to build a mutually beneficial business relationship. Our suppliers are selected on the basis of objective criteria, such as quality, reliability, competitive pricing, and ethical behavior.

Country List

Greene Tweed maintains a country list indicating the countries with which we will trade. This reflects all of the legal requirements of the countries where we do business as well as our desire to do business in countries that value human rights and political freedom.

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Corporate Responsibility in Society as a Corporate Citizen:

Human Rights

Greene Tweed is committed to respecting and supporting human rights with regard to our Personnel, the communities in which we operate, and our business partners. We support the spirit and provisions of the Universal Declaration of Human Rights and the subsequent guidance set forth in the United Nations Guiding Principles on Business and Human Rights.

Greene Tweed has a zero-tolerance approach to modern slavery. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human-trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Greene Tweed condemns any and all forms of the exploitation of children. We adhere to minimum age requirements in accordance with all laws of the countries in which we operate. And, Greene Tweed ensures working hours and remuneration comply with laws that are fair and just, in addition to adhering to the Responsible Business Alliance Code of Conduct. Greene Tweed pays a living wage in every jurisdiction in which it operates.

Greene Tweed is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure unjust working conditions are not taking place anywhere in our business or in any of our supply chains.

We expect the same high standards from all our contractors, suppliers, and other business partners. Greene Tweed may terminate our relationship with other individuals and organizations working on our behalf if they breach this Code.

Training on this Code and on the risk our business faces from modern slavery in its supply chains, forms part of the training process for all employees, and *ad hoc* training may be provided to employees as necessary.

Sustainability

Our Environmental, Social and Governance (ESG) mission is to positively impact the world by addressing the challenges of demanding applications and harsh conditions while prioritizing sustainability and responsible practices. This mission allows us to utilize our expertise in designing, developing, and manufacturing high-performance materials and engineered components with our strong commitment to environmental, social, and governance principles.

Greene Tweed strives to manufacture sustainable products through a combination of innovative designs to enhance exemplary ESG performance. This commitment informs every aspect of our business, including how we design and build new products; operate our company; collaborate with stakeholders; and report progress. Greene Tweed promotes the use of renewable energy sources and upstream recycling with reduced waste to landfills to help protect the environment.

Greene Tweed is dedicated to minimizing our environmental footprint throughout our operations. We aim to reduce energy consumption, water usage, and waste generation. We continuously

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explore innovative manufacturing techniques and invest in research and development to engineer sustainable materials and processes. By promoting the efficient use of resources, we aim to contribute to a greener future.

We additionally take daily actions to further our sustainability goals, such as minimizing our usage of electricity by ensuring all electrical appliances, where possible, are switched off at the end of each day.

Charitable Contributions and Corporate Philanthropy

Greene Tweed supports and encourages Personnel to be involved in charitable activities within their local communities.

Adherence:

All Personnel is responsible for adherence to this Code.

Internal Investigation

Greene Tweed will promptly investigate all alleged violations and potential violations of this Code, or of any related Greene Tweed standard, policy, or procedure. Any allegations will be treated confidentially, to the extent consistent with Greene Tweed’s interests and its legal obligations. All Personnel are expected to cooperate with an investigation of an alleged violation of the Code. If Greene Tweed determines that corrective action is necessary to fix a problem and avoid the likelihood of its recurrence, Greene Tweed will promptly decide what steps to take, including legal proceedings when appropriate.

Disciplinary Action

To the extent legally permissible under applicable law, appropriate disciplinary action, up to and including termination, will be taken in relation to this Code or any related Greene Tweed standard, policy, or procedure.

Nothing herein shall limit Greene Tweed from taking disciplinary action, up to and including termination, in circumstances where Greene Tweed deems such actions appropriate.

Certification

All Personnel must certify, in writing or electronically, that they have received, read, understood and shall abide by this Code.

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